

**APPENDIX A**

Exhibit No.	Description	Basis for Sealing
<b>PX 003</b>	Document produced by Google in this matter, and bearing Bates No. GOOG-AT-MDL-010689638	<p>At this time, Google requests that the Court to keep the current version of PX 003 under seal due to the potential inadvertent disclosure of privileged communications. <i>See</i> Fed. R. Evid. 502(b).</p> <p>As to non-privileged portions of the document Google would only seek limited redactions of certain non-public financial and commercial information, including revenues and revenue shares. Google's proposed redactions would be narrowly targeted and would still allow the public to understand PX 003's meaning.</p>
<b>PX 008</b>	Excerpts from the Expert Report of Robin S. Lee, on behalf of Plaintiffs, dated December 22, 2023 <sup>1</sup>	<p>Google requests limited redactions of (1) certain non-public financial, accounting, technical, and commercial information of Google's; and (2) detailed charts containing market-share analyses and calculations based either entirely or in part on Google's internal, non-public proprietary data. Google's proposed redactions are narrowly targeted and would still allow the public to understand PX 008's meaning.</p> <p>Specifically, Google seeks the following information in PX 008 to be kept under seal:</p> <ul style="list-style-type: none"> <li>• P. 38 (Fig. 17): Worldwide indirect programmatic spending on open-web display advertising by transaction type through Google's AdX and AdSense products;</li> <li>• P. 109 (Fn. 354): The percentage of AdX web publishers that sold no mobile app or tablet app impressions in 2022;</li> <li>• P. 110 (¶ 273): Average CPMs for DV360 and Google Ads in 2022;</li> </ul>

<sup>1</sup> As Plaintiffs' expert reports are marked highly confidential in their entirety, Google has not filed proposed redacted versions on the public docket. Google has instead included a description of the information within those exhibits it seeks to remain under seal.

Exhibit No.	Description	Basis for Sealing
		<ul style="list-style-type: none"> <li>• P. 110 (¶ 275): Average share of impressions derived from web pages in 2022, among publishers using AdX who offer both web and mobile app inventory;</li> <li>• P. 170 (¶ 418): Calculations of Google's operating profits in the DVAA product area ;</li> <li>• P. 170 (Fn. 591): Quotes from Dr. Respass's report regarding Google's accounting policy, and Robin S. Lee's statement reflecting the information from the quotes (i.e., the text of footnote 591);</li> <li>• P. 197 (Fn. 691): Quotes from the transcript of Jessica Mok's deposition regarding Google's accounting policy;</li> <li>• P. 198 (Fn. 696): The number of indirect open-web display impressions that AdX transacted worldwide in 2022;</li> <li>• P. 199 (Fig. 47): Shares of worldwide indirect open-web display impressions transacted through ad exchanges;</li> <li>• P. 200 (Fig. 48): Google AdX's share of worldwide indirect open-web display impressions among ad exchanges in 2022;</li> <li>• P. 200-201 (¶ 487): The proportions of display advertising transactions by U.S. publishers who engaged in indirect open-web advertising on AdX, AdSense, and DV360 that involve U.S. users;</li> <li>• P. 201 (Fn. 703): The number of indirect open-web display impressions transacted by AdX to be served to U.S. users in 2022;</li> <li>• P. 260 (¶ 629): Percentage of non-Google inventory in Google Ads' impressions in 2022, as well as the statement reflecting this percentage (i.e., the last sentence of paragraph 629);</li> <li>• P. 260 (Fn. 885): Percentage of non-Google inventory in Google Ads' open-web impressions for U.S. advertisers in 2022.</li> <li>• P. 261 (Fig. 66): Avenues of Google Ads' purchases;</li> </ul>

Exhibit No.	Description	Basis for Sealing
		<ul style="list-style-type: none"> <li>• P. 261 (¶ 630): AdX's share of Google Ads' worldwide indirect open-web display impressions on ad exchanges;</li> <li>• P. 261 (¶ 630): Third-party exchanges' share of Google Ads' worldwide indirect open-web display impressions on ad exchanges;</li> <li>• P. 261 (¶ 630): The percentage of the time when Google Ads (and AdX) wins the impression when it bids into an AdX auction;</li> <li>• P. 261 (¶ 630): The percentage of the time when Google Ads wins the impression when it bids into a rival exchange;</li> <li>• P. 261 (¶ 630): The statement that reflects the win rates when Google Ads bids into different ad exchanges (i.e., the last incomplete sentence in paragraph 630 on page 261);</li> <li>• P. 261 (Fn. 889): The statement that reflects the percentage of the time when Google Ads wins the impression when it bids into a rival exchange (i.e., the first sentence of footnote 889);</li> <li>• P. E-2 (Fig. 110): Google AdX's average take rates in the January of 2021 and 2022;</li> <li>• P. E-2 (Fig. 110): Google AdX's share of impressions in 2022;</li> <li>• P. E-2 (Fig. 111): Google Ads's average margins in the January of 2021 and 2022 for different inventory sources;</li> <li>• P. E-3 (Fig. 112): Average Google Ads's margins for different ad exchanges in 2021 and 2022;</li> <li>• P. E-3 (Fig. 113): Google Ads's margin sensitivities (transactions through AdX) under different scenarios for 2021 and 2022;</li> <li>• P. L-16 (¶ 62): Modifications made to the Poirot algorithm (i.e., the second sentence of paragraph 62);</li> <li>• P. L-18 (Fn. 1460): Descriptions of Project Alchemist (i.e., quotes from GOOG-AT-MDL-006218271, as well as the text of footnote 1460);</li> </ul>

Exhibit No.	Description	Basis for Sealing
		<ul style="list-style-type: none"> <li>• P. L-22 (¶ 77): Detailed descriptions of Project Bernanke and Content Ads Targeting v2 (i.e., quotes in paragraph 77 on page L-22);</li> <li>• P. L-22 (Fn. 1473): Descriptions of Content Ads Targeting v2 (i.e., the second sentence of the quotes from GOOG-AT-MDL-006218257);</li> <li>• P. M-1: Definition of Alchemist; and</li> <li>• P. M-1: Definition of CAT2.</li> </ul>
<b>PX 015</b>	Document produced by Google in this matter, and bearing Bates No. GOOG-AT-MDL-001970341 toGOOG-AT-MDL-001970350	As reflected in the public, redacted version filed herewith, Google requests limited redactions of certain non-public financial and commercial information, as well as non-public information reflecting recent and future strategies. Google's proposed redactions are narrowly targeted and would still allow the public to understand PX 015's meaning.
<b>PX 027</b>	Excerpts from the Expert Report of Rosa M. Abrantes-Metz, on behalf of Plaintiffs, dated December 22, 2023.	<p>Google requests limited redactions of certain non-public commercial and technical information regarding a Google product feature. Google's proposed redactions are narrowly targeted and would still allow the public to understand PX 027's meaning.</p> <p>Specifically, Google seeks the following information in PX 027 to be kept under seal:</p> <ul style="list-style-type: none"> <li>• P. 149-150 (¶ 282): Detailed descriptions of Project Poirot (i.e., the third, fourth, fifth, sixth, and seventh sentences in paragraph 282);</li> <li>• P. 150 (¶ 283): Detailed description of Project Poirot (i.e., the third sentence in paragraph 283);</li> <li>• P. 150 (Fn. 417): The quote from GOOG-DOJ-12059682 regarding Project Poirot;</li> <li>• P. 150 (Fn. 418): The quote from GOOG-AT-MDL-007393541 regarding Project Poirot; and</li> </ul>

Exhibit No.	Description	Basis for Sealing
		<ul style="list-style-type: none"> <li>• P. 150 (Fn. 419): The quote from GOOG-AT-MDL-007393541 regarding Project Poirot.</li> </ul>
<b>PX 029</b>	Excerpts from the Expert Report of Ramamoorthi Ravi, on behalf of Plaintiffs, dated December 22, 2023	<p>Google requests limited redactions of certain non-public technical, experimental, and commercial information regarding certain Google product features, as well as discussions of the underlying source code. Google's proposed redactions are narrowly targeted and would still allow the public to understand PX 029's meaning.</p> <p>Specifically, Google seeks the following information in PX 029 to be kept under seal:</p> <ul style="list-style-type: none"> <li>• P. 68 (Fn. 231): Descriptions of source code (i.e., the entire footnote 231 except for the Bates numbers of the documents cited therein);</li> <li>• P. 69 (Fn. 239): Descriptions of source code (i.e., quotes from GOOGEDVA-SC-00018 and GOOGEDVA-SC-00020);</li> <li>• P. 104 (¶ 193): Description of the experiment that Google ran for a certain model (i.e., the first sentence on page 104);</li> <li>• P. 104 (¶ 194): The current state of certain Google product features;</li> <li>• P. 104 (Fn. 426): Quotes from GOOG-DOJ-AT-02242745, regarding the experiment that Google ran for a certain model;</li> <li>• P. 104 (Fn. 427): Quotes from GOOG-AT-MDL-006218271, regarding the current state of certain Google product features.</li> </ul>
<b>PX 030</b>	Excerpts from the Expert Rebuttal Report of Rosa M. Abrantes-Metz, on behalf of Plaintiffs, dated February 13, 2024	<p>Google requests limited redactions of certain non-public pricing information. Google's proposed redactions are narrowly targeted and would still allow the public to understand PX 030's meaning.</p> <p>Specifically, Google seeks the following information in PX 030 to be kept under seal:</p>

Exhibit No.	Description	Basis for Sealing
		<ul style="list-style-type: none"> <li>• P. 126 (¶ 316): The comparison of take rates between AdX and other ad exchanges between 2020 and 2022;</li> <li>• P. 126 (¶ 316): The comparison of take rates between AdX and other ad exchanges in 2022.</li> </ul>
<b>PX 032</b>	Excerpts from the Expert Report of Gabriel Weintraub, on behalf of Plaintiffs, dated December 22, 2023	<p>Google requests limited redactions of certain non-public technical and experimental information regarding certain Google product features. Google's proposed redactions are narrowly targeted and would still allow the public to understand PX 032's meaning.</p> <p>Specifically, Google seeks the following information in PX 032 to be kept under seal:</p> <ul style="list-style-type: none"> <li>• P. 140 (Fn. 494): Descriptions of Project Bernanke (i.e., the text of footnote 494 and the quote from GOOG-DOJ-11810183);</li> <li>• P. 146-147 (¶ 221): Detailed descriptions of Project Poirot (i.e., the second and third sentences of paragraph 221);</li> <li>• P. 146-147 (Fn. 516): Detailed descriptions of Project Poirot (i.e., the text of footnote 516, as well as the quotes from the documents cited therein);</li> <li>• P. 147 (¶ 222): Detailed descriptions of Project Poirot (i.e., the first, second, and fourth sentences of paragraph 222);</li> <li>• P. 147 (Fn. 517): The quote from GOOG-DOJ-10806862, regarding Project Poirot;</li> <li>• P. 147 (Fn. 519): Quotes from GOOG-AT-MDL-008842383, regarding Project Poirot;</li> <li>• P. 147 (Fn. 521): Quotes from GOOG-AT-MDL-008842383, regarding Project Poirot;</li> <li>• P. 148 (¶ 223): Detailed descriptions of Project Poirot (i.e., the first, second, and third sentences of paragraph 223);</li> </ul>

Exhibit No.	Description	Basis for Sealing
		<ul style="list-style-type: none"> <li>• P. 148-149 (¶ 224): Detailed descriptions of Project Poirot (i.e., the second, third, and fourth sentences of paragraph 224);</li> <li>• P. 148 (Fn. 523): Detailed descriptions of Project Poirot (i.e., the text of footnote 523, as well as the quotes from the document cited therein);</li> <li>• P. 148 (Fn. 525): Detailed descriptions of Project Poirot (i.e., the first and second sentences of footnote 525);</li> <li>• P. 148 (Fn. 527): Detailed descriptions of Project Poirot (i.e., quotes from GOOG-DOJ-15743853, as well as the second and third sentences of the quotes from GOOG-DOJ-12059682);</li> <li>• P. 149 (Fn. 529): Quotes from GOOG-DOJ-12059682, regarding Project Poirot.</li> </ul>
<b>PX 041</b>	Document produced by Google in this matter, and bearing Bates No. GOOG-DOJ-AT-00858505 to GOOG-DOJ-AT-00858508	As reflected in the public, redacted version filed herewith, Google requests limited redactions of certain non-public financial information of Google's, including revenues and margins. Google's proposed redactions are narrowly targeted and would still allow the public to understand PX 041's meaning.
<b>PX 112</b>	Document produced by Google in this matter, and bearing Bates No. GOOG-DOJ-1322135	Google requests that the Court continue to seal PX 112, which is an email from D. Harrison to M. Dauwalter, because it reflects highly sensitive business information and strategy.
<b>PX 116</b>	Excerpts from the Expert Report of Robin S. Lee on behalf of Plaintiffs in this case, dated December 22, 2023.	Google requests limited redactions pertaining to market share analyses and calculations based either entirely or in part on Google's internal, non-public proprietary data; and discussion of certain confidential pricing information. Google's proposed redactions are narrowly targeted and would still allow the public to understand PX 116's meaning.

Exhibit No.	Description	Basis for Sealing
<b>PX 126</b>	Document produced by Google in this matter, and bearing Bates No. GOOG-DOJ-13221355	Google requests that the Court continue to seal PX 126, which is a non-public, internal document regarding Dynamic Revenue Share. The document contains proprietary and commercially sensitive business information, including product development strategy.
<b>PX 128</b>	Document produced by Google in this matter, and bearing Bates No. GOOG-DOJ-AT-00573309	As reflected in the public, redacted version filed herewith, Google requests limited redactions pertaining to proprietary, non-public technical project design processes. Google's proposed redactions are narrowly targeted and would still allow the public to understand PX 128's meaning.
<b>Lee Ex. A</b>	Excerpts from the Expert Report of Robin S. Lee on behalf of Plaintiffs, dated December 22, 2023	<p>Google's requested redactions pertain to (1) certain non-public business strategy, financial, accounting, customer, and commercial information of Google's; and (2) detailed charts containing market-share analyses and calculations based either entirely or in part on Google's internal, non-public proprietary data. Google's proposed redactions are narrowly targeted and would still allow the public to understand Lee Ex. A's meaning.</p> <p>Specifically, Google seeks to keep the following portions of Lee Ex. A under seal:</p> <ul style="list-style-type: none"> <li>• P. 36 (¶ 76): Amount of spend on indirect transactions on DFP;</li> <li>• P. 37 (Fig. 16): Worldwide indirect and direct open-web display advertising spend on Google DoubleClick for Publishers;</li> <li>• P. 38 (Fig. 17): Worldwide indirect programmatic spending on open-web display advertising by transaction type through Google's AdX and AdSense products;</li> <li>• P. 46 (n.108): Calculation based on Google's internal, non-public proprietary data about transactions;</li> <li>• P. 56 (¶ 125 &amp; Fig. 23): Inventory source for Google Ads, worldwide, and amount of display ad impressions Google Ads purchased through AdX or AdSense;</li> </ul>



Exhibit No.	Description	Basis for Sealing
		<ul style="list-style-type: none"> <li>• P. 61 (¶ 138 &amp; n.181): Proprietary and commercially sensitive business information about Google’s pricing;</li> <li>• P. 63 (n.189): Proprietary and commercially sensitive business information about Google’s pricing;</li> <li>• P. 109 (Fn. 354): The percentage of AdX web publishers that sold no mobile app or tablet app impressions in 2022;</li> <li>• P. 110 (¶ 273): Average CPMs for DV360 and Google Ads in 2022;</li> <li>• P. 110 (¶ 275): Average share of impressions derived from web pages in 2022, among publishers using AdX who offer both web and mobile app inventory;</li> <li>• P. 124 (¶ 305): Amount of Google’s revenues attributable to web advertising;</li> <li>• P. 125 (¶ 307 &amp; n.435): Indirect transactions’ annual share of web display advertising;</li> <li>• P. 126 (Fig. 31): Indirect and direct share of worldwide impressions on DFP (2018-2022);</li> <li>• P. 126 (n.436): Share of spend attributed to direct transactions on DFP;</li> <li>• P. 128 (n.445): Share of open-web display impressions on DFP attributed to indirect transactions;</li> <li>• P. 129 (Fig. 32): Average CPM of worldwide impressions on DFP by transaction type (2018-2022);</li> <li>• P. 140 (n.497): Non-public information about publisher customers who use Ad Connector;</li> <li>• P. 140 (n.498): Calculation based on number of AdSense transactions “backfilled” into DFP;</li> </ul>

Exhibit No.	Description	Basis for Sealing
		<ul style="list-style-type: none"> <li>• P. 148 (¶ 365): Proprietary and commercially sensitive business information about Google's pricing;</li> <li>• P. 149 (Fig. 34): Google Ads and DV360 indirect open-web display impressions by cost type (2022);</li> <li>• P. 149 (¶ 369): Number of advertisers among advertisers that use Google Ads or DV360 who only use Google Ads;</li> <li>• P. 150 (Fig. 35): Number of advertisers who used only Google Ads, only DV360, or both (2022);</li> <li>• P. 151 (Fig. 36): Total advertiser spend on indirect open-web display advertising within Google Ads and DV360 (2022);</li> <li>• P. 152 (Fig. 37): Average worldwide advertiser spend on indirect open-web display advertising within Google Ads and DV360 (2022);</li> <li>• Pp. 152-153 (¶ 372 &amp; n.533): Number and size of advertisers that spend on DV360;</li> <li>• P. 153 (Fig. 38): Use of Google Ads and DV360 across Google Ads advertisers, by spending rank (2022);</li> <li>• Pp. 154-155 (¶¶ 376-377): Spending and revenue made up of advertisers purchasing on Google Ads, DV360, and elsewhere;</li> <li>• P. 161 (n.556): Google Ads revenue derived from various regions;</li> <li>• P. 162 (n.559): Number of impressions transacted in certain geographical regions;</li> <li>• P. 163 (¶ 405 &amp; n.564): Amount of spend and impressions originating from United States on AdX and DV360;</li> <li>• P. 184 (Fig. 45): Worldwide open-web display impressions served by publisher ad servers;</li> </ul>

Exhibit No.	Description	Basis for Sealing
		<ul style="list-style-type: none"> <li>• P. 189 (n.663): Discussion of Google's current revenues from platform fees;</li> <li>• P. 197 (Fn. 691): Quotes from the transcript of Jessica Mok's deposition regarding Google's accounting policy;</li> <li>• P. 199 (Fig. 47): Shares of worldwide indirect open-web display impressions transacted through ad exchange;</li> <li>• P. 200 (Fig. 48): Google AdX's share of worldwide indirect open-web display impressions among ad exchanges in 2022;</li> <li>• Pp. 200-201 (¶ 487): The proportions of display advertising transactions by U.S. publishers who engaged in indirect open-web advertising on AdX, AdSense, and DV360 that involve U.S. users;</li> <li>• P. 204 (Fig. 50): AdX maintains a significant share of ad exchange fees from worldwide indirect open-web display transactions (2018-2022);</li> <li>• P. 205 (Fig. 51): AdX and third-party ad exchanges' shares of ad exchange fees from worldwide indirect open-web display transactions (2022);</li> <li>• P. 214 (Fig. 54): Worldwide open-web indirect display take rates for ad exchanges, and AdX's worldwide indirect open-web display market share (2018-2022);</li> <li>• P. 215 (Fig. 55): Worldwide open-web indirect display take rates for AdX and third-party exchanges (average), and AdX's worldwide indirect open-web display market share (2018-2022);</li> <li>• P. 222 (Fig. 56): Google Ads has maintained a substantial share of worldwide indirect open-web display impressions among advertiser ad networks (2018-2022);</li> </ul>

Exhibit No.	Description	Basis for Sealing
		<ul style="list-style-type: none"> <li>• P. 223 (Fig. 57): Google Ads has maintained a substantial share of fees from worldwide indirect open-web display transactions among advertiser ad networks (2018-2022);</li> <li>• P. 228 (¶ 542): Proprietary and commercially sensitive business information about Google's pricing;</li> <li>• P. 229 (¶¶ 547-548 &amp; n.794): Results of simulation exercise run by Prof. Lee based on Google's internal, non-public proprietary data;</li> <li>• P. 260 (¶ 629): Percentage of non-Google inventory in Google Ads' impressions in 2022, as well as the statement reflecting this percentage (i.e., the last sentence of paragraph 629);</li> <li>• P. 260 (Fn. 885): Percentage of non-Google inventory in Google Ads' open-web impressions for U.S. advertisers in 2022;</li> <li>• P. 261 (Fig. 66): Avenues of Google Ads' purchases;</li> <li>• P. 261 (¶ 630): AdX's share of Google Ads' worldwide indirect open-web display impressions on ad exchanges;</li> <li>• P. 261 (¶ 630): Third-party exchanges' share of Google Ads' worldwide indirect open-web display impressions on ad exchanges;</li> <li>• P. 261 (¶ 630): The percentage of the time when Google Ads (and AdX) wins the impression when it bids into an AdX auction;</li> <li>• P. 261 (¶ 630): The percentage of the time when Google Ads wins the impression when it bids into a rival exchange;</li> <li>• P. 261 (¶ 630): The statement that reflects the win rates when Google Ads bids into different ad exchanges (i.e., the last incomplete sentence in paragraph 630 on page 261);</li> </ul>

Exhibit No.	Description	Basis for Sealing
		<ul style="list-style-type: none"> <li>• P. 261 (Fn. 889): The statement that reflects the percentage of the time when Google Ads wins the impression when it bids into a rival exchange (i.e., the first sentence of footnote 889);</li> <li>• P. 271 (¶¶ 651-655, nn.933-936): Calculations about Google Ads and AdX based on Google's internal, non-public proprietary data, including about revenues;</li> <li>• P. 272, Fig. 67: AdX Direct's share of AdX worldwide indirect open-web display advertising revenue;</li> <li>• P. C-6 (Fig. 83): Regression of CPM on indicator variables for transaction type (2022);</li> <li>• P. C-6 (Fig. 84): Exchange impressions and spend by user and publisher location;</li> <li>• P. C-7 (Fig. 85): Share of publisher ad server impressions by publisher location;</li> <li>• P. C-7 (Fig. 86): Relative shares of indirect open-web display impressions by user and publisher location;</li> <li>• P. C-7 (Fig. 87): Relative shares of indirect open-web display fees by user and publisher location;</li> <li>• P. D-1 (Fig. 88): Summary of AdX's worldwide indirect open-web display shares among ad exchanges;</li> <li>• P. D-10 (Fig. 97): Summary of Google Ads' worldwide indirect open-web display shares among advertiser ad networks, and among bidding tools (advertiser ad networks and DSPs);</li> <li>• P. D-10 (Fig. 98): Summary of Google Ads' US indirect open-web display shares among advertiser ad networks, and among bidding tools (advertiser ad networks and DSPs);</li> </ul>

Exhibit No.	Description	Basis for Sealing
		<ul style="list-style-type: none"> <li>• P. D-11 (Fig. 99): Google Ads has maintained a substantial share of US indirect open-web display impressions in the ad network market;</li> <li>• P. D-19 (Fig. 107): US open-web display impressions served by publisher ad servers (2018-2022);</li> <li>• P. D-20 (Fig. 108): Annual publisher ad-server impression shares with additional parties, global and US.</li> </ul>
<b>Lee Ex. C</b>	Document produced by Google in this matter, bearing Bates No. GOOG-AT-MDL-010689638	<p>At this time, Google requests that the Court to keep the current version of Lee Ex. C under seal due to the potential inadvertent disclosure of privileged communications. <i>See</i> Fed. R. Evid. 502(b).</p> <p>As to non-privileged portions of the document Google would only seek limited redactions of certain non-public financial and commercial information, including revenues and revenue shares. Google's proposed redactions would be narrowly targeted and would still allow the public to understand Lee Ex. C's meaning.</p>
<b>Lee Ex. D</b>	Document produced by Google in this matter, bearing Bates No. GOOG-AT-MDL-006037366	<p>As reflected in the public, redacted version filed herewith, Google requests limited redactions pertaining to calculations based on Google's internal, non-public proprietary data. Google's proposed redactions are narrowly targeted and would still allow the public to understand Lee Ex. D's meaning.</p>
<b>Lee Ex. E</b>	Excerpts from the Expert Rebuttal Report of Robin S. Lee on behalf of Plaintiffs, dated February 13, 2024.	<p>Google's requested redactions pertain to certain detailed charts containing market-share analyses and other calculations based either entirely or in part on Google's internal, non-public proprietary data. Google's proposed redactions are narrowly targeted and would still allow the public to understand Lee Ex. E's meaning.</p> <p>Specifically, Google seeks to keep the following portions of Lee Ex. E under seal:</p> <ul style="list-style-type: none"> <li>• P. 50 (Fig. 8): Google Ads has maintained a substantial share of worldwide indirect open-web display impressions among advertiser ad networks;</li> <li>• P. 58 (Fig. 9): Cross-visitation analysis conducted by Dr. Israel;</li> </ul>

Exhibit No.	Description	Basis for Sealing
		<ul style="list-style-type: none"> <li>• P. 59 (¶ 159): Amount of Google Ads spending accounted for by advertiser buying both web and app impressions;</li> <li>• P. 60 (Fig. 10): Google Ads US non-video display ad spending by app vs. web (2012-2022);</li> <li>• P. 62 (Fig. 11): Google Ads US web display ad spending by instream video vs. other display (2013-2022);</li> <li>• P. 62 (¶ 164): Amount of Google Ads advertiser spending associated with various types of advertisers;</li> <li>• P. 65 (¶ 170): Proportion of open-web display impressions through DFP that were sold indirectly;</li> <li>• P. 67 (¶ 179): Proportion of advertiser spend on DV360 attributable to indirect or direct transactions;</li> <li>• P. 68 (¶ 180 &amp; Fig. 12 &amp; n.313): Distribution of DV360 US web non-video display ad spending by share of advertiser spend on indirect transactions (2022);</li> <li>• P. 85 (Fig. 130): Estimates of AdX market shares among ad exchanges using Google and third-party data;</li> <li>• P. 85 (¶ 245): Proportion of publishers who use Confiant's services by impression;</li> <li>• P. 114 (n. 524): Estimates of AdX market shares among ad exchanges using Google and third-party data;</li> <li>• P. 119 (¶ 352): Amount of DV360 spend on various ad exchanges;</li> <li>• P. 120 (Fig. 22): Ad exchanges with the highest DV360 spend, by user location (2022);</li> </ul>

Exhibit No.	Description	Basis for Sealing
		<ul style="list-style-type: none"> <li>• P. 120 (¶ 353 &amp; Fig. 23): Advertiser ad networks with the highest AdX spend, by publisher location (2022);</li> <li>• P. 161 (n.720): Proportion of revenue accounted for by “Non-Open Auction” transactions;</li> <li>• P. 172 (Fig. 32 &amp; n.755): Worldwide average advertiser ad network indirect open-web display fees (2018-2022);</li> <li>• P. 172 (¶ 492): Amount of revenue transacted by Google Ads;</li> <li>• P. B-27 (Fig. 89): Scale of Google Ads and DV360 in comparison to that of non-Google advertiser bidding tools, measured by spending on AdX;</li> <li>• P. B-28 (Fig. 90): Scale of Google Ads and DV360 in comparison to that of non-Google advertiser bidding tools, measured by impressions purchased on AdX;</li> <li>• P. B-29 (Fig. 91): Scale of AdX in comparison to that of non-Google exchanges participating in open bidding, measured by spending on GAM, worldwide (2022);</li> </ul>
<b>Lee Ex. G</b>	Excerpts from the Expert Supplemental Report of Robin S. Lee on behalf of Plaintiffs, dated March 4, 2024.	Google requests redaction of a chart (p. B-1, Fig. 6) containing market-share analyses and calculations based either entirely or in part on Google’s internal, non-public proprietary data.
<b>Lee Ex. M</b>	Document produced by Google in this matter, bearing Bates No. GOOG-DOJ-11890293.	Google requests that the Court continue to seal Lee Ex. M, which is an internal presentation containing non-public financial information of Google’s, including revenue trends.



Exhibit No.	Description	Basis for Sealing
<b>Lee Ex. N</b>	Document produced by Google in this matter, bearing Bates No. GOOG-DOJ-AT-01592535.	Google requests limited redactions of certain non-public financial information of Google's, including revenues. Google's proposed redactions are narrowly targeted and would still allow the public to understand Lee Ex. N's meaning.
<b>Simcoe Ex. A</b>	Excerpts from the Expert Report of Timothy Simcoe on behalf of Plaintiffs, dated December 22, 2023.	<p>Google's requested redactions pertain to non-public competitively sensitive customer contract terms as well as analyses based on Google's non-public proprietary data. Google's proposed redactions are narrowly targeted and would still allow the public to understand Simcoe Ex. A's meaning.</p> <p>Specifically, Google seeks to keep the following portions of Simcoe Ex. A under seal:</p> <ul style="list-style-type: none"> <li>● P. 33 (n.111): Summary of key terms of a competitively sensitive customer contract;</li> <li>● P. 37 (n.123): Proportion of AdX impressions accounted for by ten largest publishers.</li> </ul>
<b>Simcoe Ex. D</b>	Excerpts from the Expert Report of Robin S. Lee on behalf of Plaintiffs, dated December 22, 2023.	<p>Google's requested redactions pertain to (1) certain non-public, commercially sensitive discussion of business strategy; and (2) analyses of prices and margins based either entirely or in part on Google's internal, non-public proprietary data. Google's proposed redactions are narrowly targeted and would still allow the public to understand Simcoe Ex. D's meaning.</p> <p>Specifically, Google seeks to keep the following portions of Simcoe Ex. D under seal:</p> <ul style="list-style-type: none"> <li>● P. 217 (n. 745): Discussion of strategy for relaunching of RPO;</li> <li>● P. E-2 (Fig. 110): Summary of worldwide open-web indirect display take rates among ad exchanges;</li> </ul>

Exhibit No.	Description	Basis for Sealing
		<ul style="list-style-type: none"> <li>• P. E-2 (Fig. 111): Summary of worldwide open-web indirect display margins among ad networks.</li> </ul>
<b>Simcoe Ex. G</b>	Excerpts from the Expert Rebuttal Report of Robin S. Lee on behalf of Plaintiffs, dated February 13, 2024.	<p>Google's requested redactions pertain to certain non-public financial information of Google's. Google's proposed redactions are narrowly targeted and would still allow the public to understand Simcoe Ex. G's meaning.</p> <p>Specifically, Google seeks to keep the following portions of Simcoe Ex. G under seal:</p> <ul style="list-style-type: none"> <li>• P. 161 (n.720): Percent of gross revenue accounted for by "Non-Open Auction" transactions</li> </ul>
<b>Simcoe Ex. H</b>	Excerpts from the Expert Report of Mark A. Israel on behalf of Google, dated January 23, 2024. <sup>2</sup>	<p>Google requests limited redactions pertaining to analyses based on Google's internal, non-public proprietary data. Google's proposed redactions are narrowly targeted and would still allow the public to understand Simcoe Ex. H's meaning.</p> <p>Specifically, Google seeks to keep the following portions of Simcoe Ex. H under seal:</p> <ul style="list-style-type: none"> <li>• P. 212 (¶ 271): Percentage of Ad's Share of U.S. DFP Indirect Web Display;</li> <li>• P. 212 (Figure 40): AdX Share of U.S. DFP Indirect Web Display (Non-Video) Impressions (2019-2022).</li> </ul>
<b>Simcoe Ex. J</b>	Excerpts from the Expert Report of Paul R. Milgrom	Google requests limited redactions pertaining to discussion of internal, commercially sensitive results of Project Poirot experiments (P. 171-72 (¶¶ 247-48)).

<sup>2</sup> Due to the inclusion of third-party information, Google is not filing a proposed redacted version of Simcoe Ex. H in connection with this response.

Exhibit No.	Description	Basis for Sealing
	on behalf of Google, dated January 23, 2024. <sup>3</sup>	Google's proposed redactions are narrowly targeted and would still allow the public to understand Simcoe Ex. J's meaning.
<b>Simcoe Ex. L</b>	Excerpts from the transcript of the deposition of Jason Hsueh in his capacity as a corporate representative of Google, taken on November 15, 2023.	As reflected in the proposed redacted version filed herewith, Google requests limited redactions pertaining to discussions of commercially sensitive business strategy. Google's proposed redactions are narrowly targeted and would still allow the public to understand Simcoe Ex. L's meaning.
<b>Simcoe Ex. M</b>	Excerpts from the Expert Report of Gabriel Weintraub on behalf of Plaintiffs in this case, dated December 22, 2023.	<p>Google's requested redactions pertain to (1) discussions of commercially sensitive business strategy; and (2) certain non-public Google financial information. Google's proposed redactions are narrowly targeted and would still allow the public to understand Simcoe Ex. M's meaning.</p> <p>Specifically, Google seeks to keep the following portions of Simcoe Ex. M under seal:</p> <ul style="list-style-type: none"> <li>• P. 163 (n.258): Discussion of details of commercially sensitive experiments run by Google.</li> </ul>
<b>Lim Ex. A</b>	Excerpts from the Expert Rebuttal Report of Adoria Lim, on behalf of Plaintiffs in this case, dated February 13, 2024.	<p>Google's proposed redactions pertain to certain non-public financial, accounting, technical, and commercial information of Google's. Google's proposed redactions are narrowly targeted and would still allow the public to understand Lim Ex. A's meaning.</p> <p>Specifically, Google seeks the following information in Lim Ex. A to be kept under seal:</p>

<sup>3</sup> Due to the inclusion of third-party information, Google is not filing a proposed redacted version of Simcoe Ex. J in connection with this response.

Exhibit No.	Description	Basis for Sealing
		<ul style="list-style-type: none"> <li>• P. 4 (¶ 14): non-public profitability margin information regarding Google's DVAA Product Area;</li> <li>• Pp. 7-8 (¶¶ 22-23 &amp; nn. 25-27): details regarding Google's specific preparation of financial reports for internal purposes and deposition excerpts regarding the same;</li> <li>• P. 17 (¶ 35 &amp; nn. 56-58): Quotes from Google's internal, proprietary financial and accounting documents, including accounting memoranda;</li> <li>• P. 54 (¶ 108): A direct quote from Google's non-public accounting policy document;</li> <li>• P. 55-56 (¶ 109): Direct quotes from Google's non-public, internal financial profit and loss statements;</li> <li>• P. 56 (Fig. 30): Modified DVAA P&amp;L (2014-2022).</li> </ul>
<b>Lim Ex. B</b>	Excerpts from the Expert Report of Dr. Thomas S. Respass III, on behalf of Plaintiffs, dated December 22, 2024.	<p>Google's proposed redactions pertain to certain non-public financial, accounting, technical, and commercial information of Google's. Google's proposed redactions are narrowly targeted and would still allow the public to understand Lim Ex. B's meaning.</p> <p>Specifically, Google seeks the following information in Lim Ex. A to be kept under seal:</p> <ul style="list-style-type: none"> <li>• P. 29 (Fig. 13): AdX Revenues and Actual Take through DV360 and Google Ads subject to Respass product market filters worldwide and U.S. advertisers, January 25, 2019 - January 24, 2023;</li> <li>• P. 31 (Fig. 15): AdX overcharge to worldwide and United States advertisers and publishers, January 25, 2019 - January 24, 2023;</li> <li>• P. 38 (¶ 84 &amp; n.63): details regarding Google's financial and accounting practices derived from Google's internal, proprietary financial statements and accounting documents;</li> </ul>

Exhibit No.	Description	Basis for Sealing
		<ul style="list-style-type: none"> <li>• P. 39 (Fig. 21): Google services management structure;</li> <li>• P. 39-40 (§ 86): details regarding Google's financial and accounting practices derived from Google's internal, proprietary financial statements and accounting documents;</li> <li>• P.40 (Fig. 22): Google's accounting terms;</li> <li>• P. 41 (§ 87): details regarding Google's booked revenues, gross profits, and operating profits from 2014 through 2022;</li> <li>• P. 42 (Fig. 23): Profit &amp; Loss Statement (2014-2022);</li> <li>• P. 42 (§ 88 &amp; n.78): Profit and loss data from 2014 – 2022;</li> <li>• P. 43 (Fig. 24): Profit &amp; Loss Statement (2014-2022);</li> <li>• P. 43 (§ 89): Profit and loss data from 2014 – 2022;</li> <li>• P. 44-46 (§§ 90-93 &amp; nn. 80-81, n.83): detailed description of Google's non-public, proprietary financial and accounting statements;</li> <li>• P. 45 (Fig. 25): excerpt from Google's internal, non-public, proprietary financial statement;</li> <li>• P. 46 (Fig. 26): excerpt from Google's internal, non-public, proprietary finance and accounting presentation;</li> <li>• P. 47 (Fig. 27): Example changes of cost allocation buy-side/sell-side view to MECE view;</li> <li>• P. 47-48 (§§ 94-97 &amp; n.89): detailed description of Google's financial and accounting practices derived from Google's internal, proprietary financial statements and accounting documents;</li> <li>• Pp. 49-51 (§§ 98-100 &amp; n. 91, 94, 96): detailed description of Google's financial data from 2014 through 2022 and finance and accounting</li> </ul>

Exhibit No.	Description	Basis for Sealing
		<p>practices, derived from Google's internal, proprietary financial statements and accounting documents;</p> <ul style="list-style-type: none"> <li>• P. 49 (Fig. 28): Profit &amp; Loss Statement (2014-2022);</li> <li>• P. 55-56 (¶ 109): detailed description of Google's financial data and finance and accounting practices, derived from Google's internal, proprietary financial statements and accounting documents;</li> <li>• P. 56 (¶ 110): Google's financial data from 2014 through 2022, including operating profit margins;</li> <li>• P. 56 (Fig. 30): Profit &amp; Loss Statement (2014-2022).</li> </ul>
<b>Lim Ex. D</b>	Excerpt of Google's supplemental response to Plaintiffs' Interrogatory No. 3.	Google requests that the Court continue to seal Lim Ex. D, which includes descriptions of Google's internal finance and accounting processes.
<b>Lim Ex. E</b>	Excerpt from the deposition transcript of Adoria Lim, dated February 29, 2024	<p>Google requests limited redactions of certain non-public, proprietary information regarding Google's internal financial audits. Google's proposed redactions are narrowly targeted and would still allow the public to understand Lim Ex. E's meaning.</p> <p>Specifically, Google requests that Tr. 318:12-20 remain under seal.</p>
<b>Lim Ex. M</b>	Excerpts from the Expert Report of Robin S. Lee on behalf of Plaintiffs in this case, dated December 22, 2023.	<p>Google's proposed redactions pertain to Google's non-public, proprietary pricing strategy. Google's proposed redactions are narrowly targeted and would still allow the public to understand Lim Ex. M's meaning.</p> <p>Specifically, Google requests that P. 224 (¶ 535) be kept under seal because it contains details regarding Google Ads's target margins.</p>
<b>Lim Ex. N</b>	Excerpts from the Expert Report of Mark A. Israel on	As reflected in the proposed redacted version filed herewith, Google requests a limited redaction of certain non-public financial and commercial information,

Exhibit No.	Description	Basis for Sealing
	behalf of Google in this case, dated January 23, 2024.	including Google's operating profit from 2015-2017. Google's proposed redactions are narrowly targeted and would still allow the public to understand Lim Ex. N's meaning.
<b>Ferrante Ex. E</b>	Excerpts from the Expert Report of Wenke Lee on behalf of Plaintiffs, dated February 13, 2024.	Google's proposed redactions pertain to Google's non-public, proprietary security processes. Google's proposed redactions are narrowly targeted and would still allow the public to understand Ferrante Ex. E's meaning. Specifically, Google requests that P. 22 (§ 69 n.47) be kept under seal because it contains details regarding Google's non-public, proprietary security process.
<b>Simonson Ex. C</b>	Excerpts from the Expert Report of Wayne D. Hoyer on behalf of Plaintiffs, dated February 13, 2024.	Google's proposed redactions pertain to Google's non-public, proprietary customer revenue data. Google's proposed redactions are narrowly targeted and would still allow the public to understand Simonson Ex. C's meaning. Specifically, Google seeks the following information in Simonson Ex. C to be kept under seal: <ul style="list-style-type: none"> <li>• P. 37 (§ 66(b) &amp; n.114): details regarding Google's revenue from U.S. advertising agencies;</li> <li>• P. 38 (§ 68 &amp; nn. 119, 121): details regarding Google's revenue from top advertiser customers.</li> </ul>
<b>Simonson Ex. D</b>	Document produced by Google in this matter, and bearing Bates No. GOOG-AT-MDL-008285890	Google requests that the Court continue to seal Simonson Ex. D, which is a non-public, internal document containing proprietary business strategy and customer revenue statistics.
<b>Simonson Ex. E</b>	Document produced by Google in this matter, and	Google requests that the Court continue to seal Simonson Ex. E, which is a non-public, internal document containing proprietary business strategy and customer revenue statistics.

Exhibit No.	Description	Basis for Sealing
	bearing Bates No. GOOG-AT-MDL-011124130	
<b>Simonson Ex. F</b>	Document produced by Google in this matter, and bearing Bates No. GOOG-AT-MDL-011120632	Google requests that the Court continue to seal Simonson Ex. F, which is a non-public, internal document containing proprietary business strategy and customer revenue statistics.
<b>Simonson Ex. G</b>	Document produced by Google in this matter, and bearing Bates No. GOOG-DOJ-03047055	Google requests that the Court continue to seal Simonson Ex. G which is a non-public, internal document containing proprietary business strategy and customer revenue statistics.
<b>Simonson Ex. H</b>	Excerpts from the Expert Report of Mark A. Israel on behalf of Google in this case, dated January 23, 2024 <sup>4</sup>	<p>Google requests a limited redaction of certain non-public, proprietary information, including detailed information regarding advertiser spending on Google's platforms derived from Google's internal, non-public, proprietary data. Specifically, Google seeks the following information in Simonson Exhibit C to be kept under seal:</p> <ul style="list-style-type: none"> <li>● P. 142 (n. 201): Discussion of percentages of Google Ads advertiser spend</li> <li>● P. 144 (n. 206): Discussion of AdX customer spending</li> <li>● P. 145 (Table 1): AdX U.S. Spending Patterns for Selected Advertisers, 2019-2022</li> <li>● P. 145 (n. 207) :Discussion of AdX customer spending</li> <li>● P. 147 (Table 2): Google Ads and DV360 Spending by Advertiser Size, 2022</li> </ul>

<sup>4</sup> Due to the inclusion of third-party information, Google is not filing a proposed redacted version of Simonson Ex. H in connection with this response.



Exhibit No.	Description	Basis for Sealing
		<ul style="list-style-type: none"> <li>• P. 160 (Figure 20): Distribution of DV360 U.S. Web Non-Video Display Ad Spending by Advertiser Use</li> <li>• P. 194 (Figure 34): Distribution of Google Ads U.S. Non-Video Display Ad Spending</li> <li>• P. 197 (Figure 37): Distribution of Google Ads U.S. Non-Video Display Ad Spending</li> </ul>
<b>Simonson Ex. N</b>	Excerpts from the Deposition of Wayne D. Hoyer, dated March 4, 2024.	Google requests a limited redaction of certain non-public, proprietary commercial information, including a reference to certain of Google Ads's largest advertising customers. Google's proposed redactions are narrowly targeted and would still allow the public to understand Simonson Ex. N's meaning.